

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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DATE FILED: 8/29/11

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INDERPAL SINGH, Individually and On
Behalf of All Others Similarly Situated.

Plaintiff,

v.

YUHE INTERNATIONAL, INC., GAO
ZHENTAO, HU GANG, JIANG YINGJUN,
PETER LI, LIU YAOJIN, GREG HUETT,
HAN CHENGXIANG, CHILD VAN
WAGONER & BRADSHAW, PLLC, ROTH
CAPITAL PARTNERS. LLC, RODMAN &

Defendant.
-----X

No. 11-CIV-4526 (JGK)

ECF CASE

**STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME TO RESPOND TO
COMPLAINT**

Plaintiff Inderpal Singh ("Plaintiff") and defendant Roth Capital Partners, LLC ("Roth"), jointly submit the following Stipulation and [Proposed] Order Extending Time to Respond to the Complaint.

WHEREAS, on July 1, 2011, Plaintiff filed the above-captioned Class Action Complaint for Violations of the Federal Securities Laws against Yuhe International, Inc. ("Yuhe" or the "Company"), certain of its officers and directors, the underwriters for the Company's securities offerings, and the Company's independent auditor (the "Action");

WHEREAS, two other similar federal class action complaints have also been filed against the Company and certain of the same individual defendants in other jurisdictions. These actions are captioned Wilson v. Yuhe International, Inc. et al., Case No. 1:11-cv-22305-PAS, filed on June 24, 2011 in the Southern District of Florida, and Feyko v. Yuhe International, Inc. et al.,

Case No. 2:11-cv-5511-DDP-PJW, filed on July 1, 2011 in the Central District of California;

WHEREAS, these three actions arise from similar facts, are brought on behalf of the Company's investors, and all allege violations of the federal securities laws based on similar conduct;

WHEREAS, the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4 et seq., prescribes a process for the appointment of Lead Plaintiff and approval of Lead Counsel to represent the class;


WHEREAS, the parties anticipate that a consolidated amended complaint will be filed following the appointment of the Lead Plaintiff;

WHEREAS, on August 10, 2011, the Court granted the stipulation entered into by Plaintiff, Yuhe and defendant Child Van Wagoner & Bradshaw, PLLC ("Child Van Wagoner"), and entered an Order that Yuhe and Child Van Wagoner need not respond to the initial complaint filed in the Action, and once a Lead Plaintiff has been appointed, the parties will submit either a joint or separate proposed schedule(s) regarding the filing of a consolidated amended complaint and the defendants' responses thereto;

IT IS SO STIPULATED that Roth does not need to respond to the initial complaint filed in the Action, and once a Lead Plaintiff has been appointed, the parties will submit either a joint or separate proposed schedule(s) regarding the filing of a consolidated amended complaint and the defendants' responses thereto.


Dated: New York, New York
August 22, 2011

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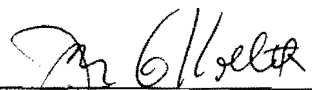
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Attorneys for Plaintiff Inderpal Singh

SO ORDERED on the 28 day of August 2011


Hon. John G. Koetl, U.S.D.J.

